



January 18, 2022

Via ECF

Hon. P. Kevin Castel, U.S.D.J.  
United States Courthouse, Courtroom 11D  
500 Pearl Street  
New York, New York 10007

Re: Struna v. Leonardi et al.  
Case No.: 1:21-cv-06040-PKC

The Clerk is respectfully directed to seal the Corrado Declaration (Doc 50). Plaintiff's counsel shall promptly re-file the Corrado Declaration with the redactions to Exhibit A authorized by Rule 5.2, Fed. R. Civ. P. SO ORDERED.

1/18/2022

A handwritten signature in black ink, appearing to read "P. Kevin Castel".

P. Kevin Castel  
United States District Judge

Dear Judge Castel:

As the Court is aware, this law firm is co-counsel for Plaintiff William Struna ("Plaintiff"). Pursuant to 3(A) and 5(b) of the Court's Individual Practices, please accept the following as Plaintiff's Pre-Motion Letter to seal the Declaration of Giacomo J. Corrado (ECF Doc. No. 50) ("the Corrado Declaration"), and for permission to file this document in redacted form.

Exhibit A to the Corrado Declaration is a copy of the *Certificato di Eredita'* ("Certificate of Inheritance") issued by the Civil Court of Trento, Italy on December 16, 2019 in connection with the Estate of Renzo Leonardi. The unredacted copy contains the dates of birth of defendants and the decedent. Defendants' counsel has asked that we re-file the document in redacted form so that it only shows the year of birth.

This request is made pursuant to Fed. R. Civ. P. 5.2(a). Although Fed. R. Civ. P. 5.2(b)(4) excepts "record[s] of a court or tribunal," it does not state whether this exception applies to foreign courts. Moreover, because the full date of birth is not material to the Court's determination, we are acceding to the request of our adversary, who understandably seeks to protect the privacy of his clients.

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We thank the Court for its courtesies in considering the foregoing.

Respectfully submitted,

/s/ Andrew M. Moskowitz  
Andrew M. Moskowitz

cc: All Counsel of Record (via ECF)